

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

UNITED STATES OF AMERICA

v.

TAMEKA BABULAL,
a/k/a Tameka Williams,
a/k/a Sharniece Williams,
a/k/a Meek Williams, and
JOEL BABULAL,
a/k/a Joel Nical Babulal,
a/k/a Mark Khan,

Defendants.

INDICTMENT

25 Cr. 310

COUNT ONE

(Conspiracy to Steal and Unlawfully Possess Mail)

The Grand Jury charges:

1. From at least in or about July 2021 through May 23, 2024, in the Southern District of New York and elsewhere, TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit an offense against the United States, namely, the theft of mail by a Postal Service officer or employee and unlawful possession of such mail, in violation of Title 18, United States Code, Sections 1708 and 1709.

2. It was a part and object of the conspiracy that TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, and others known and unknown, would and did, while TAMEKA BABULAL was a Postal Service officer and employee, knowingly embezzle letters, postal cards, packages, bags, and mail, and articles and things contained therein entrusted to her

and which came into her possession intended to be conveyed by mail, and carried and delivered by a carriers, messengers, agents, and other persons employed in a department of the Postal Service, and forwarded through and delivered from a post office and station thereof established by authority of the Postmaster General and of the Postal Service, and steal, abstract, and remove from such letters, packages, bags, and mail, articles and things contained therein, to wit, TAMEKA BABULAL and JOEL BABULAL conspired for TAMEKA BABULAL to embezzle mail and steal items from said mail, including credit cards, checks, correspondence, and personal identifying information, that she was entrusted to deliver from the U.S. Postal Service Processing and Distribution Center in Mount Vernon, New York.

3. It was a further part and object of the conspiracy that TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, and others known and unknown, would and did receive, and conceal, and unlawfully have in their possession, letters, postal cards, packages, bags, and mail, and articles and things contained therein, which had been stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, TAMEKA BABULAL and JOEL BABULAL conspired to embezzle and steal mail from the custody of the United States Postal Service in Mount Vernon, New York, and to subsequently possess said stolen mail in Hempstead, New York.

Overt Acts

4. In furtherance of the conspiracy and to effect the illegal objects thereof, the following overt acts, among others, were committed by TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a JOEL NICAL BABULAL, a/k/a Mark Khan, the defendants, and others known and unknown, in the

Southern District of New York, and elsewhere:

a. On or about July 12, 2021, TAMEKA BABULAL submitted a fraudulent application for employment with the U.S. Postal Service, in which she falsely certified that her former supervisor during prior employment at a restaurant was “Mark Khan,” for whom she provided a phone number used by JOEL BABULAL.

b. TAMEKA BABULAL embezzled and stole mail she was entrusted to deliver in Mount Vernon, New York.

c. TAMEKA BABULAL removed said mail from Mount Vernon, New York, and transported it to her and JOEL BABULAL’s residence in Hempstead, New York.

d. JOEL BABULAL received embezzled and stolen mail at his and TAMEKA BABULAL’s residence in Hempstead, New York.

e. TAMEKA BABULAL and JOEL BABULAL knowingly possessed embezzled and stolen mail at their shared residence in Hempstead, New York.

(Title 18, United States Code, Section 371.)

COUNT TWO
(Theft of Mail by Postal Service Officer or Employee)

The Grand Jury further charges:

5. From at least in or about July 2023 through at least in or about February 2024, TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, being a Postal Service officer and employee, and JOEL BABULAL, a/k/a JOEL NICAL BABULAL, a/k/a Mark Khan, the defendants, knowingly embezzled, stole, and took a letter, postal card, package, bag, and mail, and an article and thing contained therein entrusted to TAMEKA BABULAL and which came into her possession intended to be conveyed by mail, and carried and delivered by a carrier, messenger, agent, and other person employed in a department

of the Postal Service, and forwarded through and delivered from a post office and station thereof established by authority of the Postmaster General and of the Postal Service, and stole, abstracted, and removed from such letter, package, bag, and mail, an article and thing contained therein, to wit, TAMEKA BABULAL embezzled mail and stole items from said mail, including credit cards, checks, correspondence, and personal identifying information, that TAMEKA BABULAL was entrusted to deliver from the U.S. Postal Service Processing and Distribution Center in Mount Vernon, New York.

(Title 18, United States Code, Sections 1709 and 2.)

COUNT THREE
(Unlawful Possession of Mail)

The Grand Jury further charges:

6. From at least in or about July 2023 through May 23, 2024, in the Southern District of New York and elsewhere, TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, knowingly bought, received, and concealed, and unlawfully had in their possession, a letter, postal card, package, bag, and mail, and an article and thing contained therein, which had been so stolen, taken, embezzled, and abstracted, knowing the same to have been stolen, taken, embezzled, and abstracted, to wit, TAMEKA BABULAL and JOEL BABULAL embezzled and stole mail from the custody of the United States Postal Service in Mount Vernon, New York, which TAMEKA BABULAL transported to Hempstead, New York, where TAMEKA BABULAL and JOEL BABULAL possessed the stolen mail at their shared residence.

(Title 18, United States Code, Sections 1708 and 2.)

COUNT FOUR
(Conspiracy to Commit Wire Fraud and Bank Fraud)

The Grand Jury further charges:

7. From at least in or about July 2023 through May 23, 2024, in the Southern District of New York and elsewhere, TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, and others known and unknown, willfully and knowingly combined, conspired, confederated, and agreed together and with each other to commit wire fraud, in violation of Title 18, United States Code, Section 1343.

8. It was a part and an object of the conspiracy that TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, and others known and unknown, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, would and did transmit and cause to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds for the purpose of executing such scheme and artifice, in violation of Title 18, United States Code, Section 1343, to wit, TAMEKA BABULAL and JOEL BABULAL fraudulently used credit cards in the names of others, which they stole from the mail, and obtained credits cards in the names of others using documents and identifying information of others which they stole from the mail, and fraudulently deposited checks they stole from the mail, including through the use of the Internet, mobile payment service companies, telephone calls, emails and other electronic communications they sent and caused to be sent to and from the Southern District of New York.

9. It was a further part and object of the conspiracy that TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, knowingly executed, and attempted to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, TAMEKA BABULAL and JOEL BABULAL fraudulently used credit cards in the names of others, which they stole from the mail and obtained using documents and identifying information of others they stole from the mail, and fraudulently deposited checks they stole from the mail, in order to defraud banks and obtain money under the custody and control of banks.

(Title 18, United States Code, Section 1349.)

COUNT FIVE
(Wire Fraud)

The Grand Jury further charges:

10. From at least in or about December 27, 2022, through at least in or about October 2023, in the Southern District of New York and elsewhere, TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, knowingly having devised and intending to devise a scheme and artifice to defraud, and for obtaining money and property by means of false and fraudulent pretenses, representations, and promises, transmitted and caused to be transmitted by means of wire, radio, and television communication in interstate and foreign commerce, writings, signs, signals, pictures, and sounds, for the purpose of executing such scheme and artifice, to wit, TAMEKA BABULAL and JOEL BABULAL fraudulently used credit cards in the names of

others, which they stole from the mail and obtained using documents and identifying information of others they stole from the mail, and fraudulently deposited checks they stole from the mail, including through the use of the Internet, mobile payment service companies, telephone calls, emails and other electronic communications they sent and caused to be sent to and from the Southern District of New York.

(Title 18, United States Code, Sections 1343 and 2.)

COUNT SIX
(Bank Fraud)

The Grand Jury further charges:

11. From at least in or about December 27, 2022, through at least in or about October 2023, in the Southern District of New York and elsewhere, TAMEKA BABULAL, a/k/a Tameka Williams, a/k/a Sharniece Williams, a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, knowingly executed, and attempted to execute, a scheme and artifice to defraud a financial institution, as that term is defined in Title 18, United States Code, Section 20, and to obtain moneys, funds, credits, assets, securities, and other property owned by, and under the custody and control of, such a financial institution, by means of false and fraudulent pretenses, representations, and promises, to wit, TAMEKA BABULAL and JOEL BABULAL fraudulently used credit cards in the names of others, which they stole from the mail and obtained using documents and identifying information of others they stole from the mail, and fraudulently deposited checks they stole from the mail, in order to defraud banks and obtain money under the custody and control of banks.

(Title 18, United States Code, Sections 1344 and 2.)

COUNT SEVEN
(Aggravated Identity Theft)

The Grand Jury further charges:

12. From at least in or about July 6, 2023, through at least in or about September 13, 2023, in the Southern District of New York and elsewhere, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, knowingly transferred, possessed, and used, without lawful authority, a means of identification of another person, during and in relation to a felony violation enumerated in Title 18, United States Code, Section 1028A(c), to wit, TAMEKA BABULAL and JOEL BABULAL used and transferred the means of identification of other persons during and in relation to their scheme and conspiracy to commit the violations charged in Counts Four through Six of this Indictment.

(Title 18, United States Code, Sections 1028A(a)(1),
1028A(b), and 2.)

COUNT EIGHT
(False Statements)

The Grand Jury further charges:

13. On or about July 12, 2021, in the Southern District of New York and elsewhere, TAMEKA BABULAL, a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, to wit, on an application for employment with the United States Postal Service at the Wappingers Falls, New York, location, which TAMEKA BABULAL certified as true and caused to be sent to the United States Postal Service, TAMEKA BABULAL falsely stated, in sum and substance that she previously worked at a restaurant in Hempstead, New York, where she was

supervised by a person named “Mark Khan.”

(Title 18, United States Code, Section 1001(a)-(2).)

COUNT NINE
(False Statements)

The Grand Jury further charges:

14. On or about November 1, 2024, in the Southern District of New York, JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendant, in a matter within the jurisdiction of the executive branch of the Government of the United States, knowingly and willfully made a materially false, fictitious, and fraudulent statement and representation, to wit, during an interview with a Special Agent from the United States Postal Service Office of Inspector General at the U.S. Attorney’s Office in White Plains, New York, JOEL BABULAL falsely stated, in sum and substance that: (i) he did not use the name “Mark Khan,” (ii) he did not use a phone number ending in 8717, (iii) he did not know why an Instagram account with the Instagram ID “mark.khan.3192479” was on his phone, and (iv) he did not purchase any Amazon packages to be shipped to “Mark khan” at his residence in Hempstead, New York.

(Title 18, United States Code, Section 1001(a)-(2).)

FORFEITURE ALLEGATION

15. As a result of committing the offense alleged in Count One through Six of this Indictment, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C) and Title 28 United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but

not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offenses.

16. As a result of committing the offense alleged in Count Seven of this Indictment, TAMEKA BABULAL a/k/a Tameka Williams a/k/a Sharniece Williams a/k/a Meek Williams, and JOEL BABULAL, a/k/a Joel Nical Babulal, a/k/a Mark Khan, the defendants, shall forfeit to the United States, pursuant to Title 18, United States Code, Sections 982(a)(2)(B) and 1028(b), any and all property constituting, or derived from, proceeds obtained directly or indirectly as a result of said offense and any and all personal property used or intended to be used to commit said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

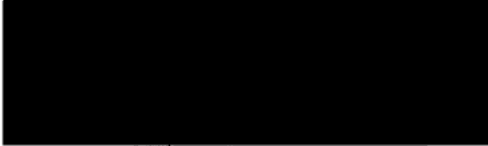
Substitute Assets Provision

17. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 18, United States Code, Section 982;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON

A handwritten signature in cursive script that reads "Jay Clayton".

JAY CLAYTON
United States Attorney